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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR PIERCE COUNTY**

9  
10 TINA BROVOLD, an individual,

11 Plaintiff,

12 vs.

13 SAFEWAY, INC., a foreign profit  
14 corporation,

15 Defendant.

Case No.

**COMPLAINT FOR PERSONAL  
INJURY**

16  
17 COMES NOW Plaintiff, Tina Brovold, by and through her attorneys of record, Richard  
18 S. Aguire and Kevin B. Page of Ritchie Reiersen, PLLC, and hereby alleges the following:

19  
**I. PARTIES**

20 1.1 Plaintiff, Tina Brovold, resides in Pierce County, Washington.

21 1.2 Defendant Safeway, Inc., is a foreign, for-profit, business in Pierce County,  
22 Washington.

23  
**II. JURISDICTION/ VENUE**

24 2.1 This Court has jurisdiction pursuant to Article 4 of the Washington State  
25 Constitution and RCW 2.08.010.

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Complaint  
Page 1 of 3

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110 2nd St SW Suite 135  
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1                   **2.2     Venue is proper pursuant to RCW 4.12.020(3) because this is an action for recovery**  
2     **of damages for injuries, the cause of which occurred within Pierce County, Washington.**

3                   **III. BACKGROUND/FACTS**

4                   **3.1     On or about March 8, 2017, plaintiff was shopping at the Safeway Store located at**  
5     **1624 72<sup>nd</sup> Street East in Tacoma, Pierce County, Washington.**

6                   **3.2     While exercising due care for her own safety, plaintiff took a step back from the**  
7     **lottery ticket vending machine to allow another shopper to pass by with a shopping cart.**

8                   **3.3     Plaintiff then slipped on a clear liquid substance.**

9                   **3.4     There were no signs indicating a wet floor in the area where Plaintiff fell.**

10                   **3.5     The slippery floor caused Plaintiff to fall and sustain injury.**

11                   **IV. DUTY AND BREACH**

12                   **4.1     Defendant Safeway, Inc., had a duty to maintain the aisles and floors of its store**  
13     **in a reasonably safe condition which did not pose a risk of injury to business invitees.**

14                   **4.2     Defendant Safeway, Inc., breached this duty and was negligent in that it failed to**  
15     **properly maintain the aisles and floors in a reasonably safe condition.**

16                   **4.3     Defendant Safeway, Inc., breached this duty and was negligent in that it knew, or**  
17     **should have known of the dangerous condition or to notify or warn business invitees of the**  
18     **unreasonably dangerous condition caused by the liquid substance on the floor.**

19                   **V. DAMAGES**

20                   **5.1     As a direct and proximate result of defendant's breach of duty, plaintiff has**  
21     **suffered personal injuries the extent of which are not now known but will be proven at trial.**

22                   **5.2     As a direct and proximate result of defendant's breach of duty, plaintiff has**  
23     **incurred reasonable and necessary medical expenses.**

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Complaint  
Page 2 of 3

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1           5.3    As a direct and proximate result of defendant's breach of duty, plaintiff has  
2    incurred injuries, pain, suffering, and anguish.

3           5.4    As a direct and proximate result of defendant's breach of duty, plaintiff will suffer  
4    future medical expenses and future pain and suffering.

5           5.5    As a direct and proximate result of defendant's breach of duty, plaintiff has  
6    sustained wage loss.

7           5.6    As a direct and proximate result of defendant's breach of duty, plaintiff has  
8    incurred such other damages as will be proven at trial.

9  
10           **VI. PRAYER FOR RELIEF**

11           Plaintiff prays judgment against the Defendants as follows:

12           6.1    For economic damages in an amount to be determined at trial;

13           6.2    For non-economic damages in an amount to be determined at trial;

14           6.3    For statutory attorney's fees and costs; and

15           6.4    For all other relief the Court deems just and equitable.

16           DATED this 14<sup>th</sup> day of February 2020.

17           RITCHIE REIERSEN, PLLC

18           By: \_\_\_\_\_

19           RICHARD S. AGUIRE, WSBA #49534  
20           KEVIN B. PAGE, WSBA #49585  
21           *Atorneys for Plaintiff*

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Complaint  
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